

  
CLERK OF THE COURT

IN THE EIGHTH JUDICIAL DISTRICT COURT OF CLARK COUNTY, NEVADA

COLEMAN FAMILY REVOCABLE LIVING TRUST,  
By and through its Trustees, SAHAR LEWIS and PLUYD COLEMAN,  
Plaintiff,

v.

PNC BANK, NATIONAL ASSOCIATION; MATRIX TRUST COMPANY; CLEAR RECON  
CORP; STEFANIE ARMIJO; and DOES 1-100,  
Defendants.

Case No.: A-25-916476-C  
Dept. No.: 7

*Hearing  
Requested*

**MOTION TO INVOKE EQUITY JURISDICTION, ENTER CONSTRUCTIVE TRUST. AND  
ACCEPT ADMINISTRATIVE DEFAULT**

[With Exhibits: Certificate of Dishonor, Letter of Default]

Hearing Date: 5-22-25  
@ 9AM

**MOTION TO INVOKE EQUITY JURISDICTION AND CONSTRUCTIVE TRUST**

COMES NOW, the Plaintiff, COLEMAN FAMILY REVOCABLE LIVING TRUST ("CFRLT"), a foreign private trust, by and through its trustees, and hereby moves this honorable court to invoke its equity jurisdiction in this matter and to recognize a constructive trust over the property located at 3139 Belvedere Dr, Henderson, Nevada, as the defendants have failed to rebut, honor, or respond to lawful presentments made in the private domain.

This motion is based on the following:

1. The Trust issued lawful private notices and presentments to PNC BANK and affiliated parties regarding the nature of the debt, the dishonor of negotiable instruments, and the demand for accounting and validation of claim.
2. Defendants failed to respond or rebut in any meaningful, lawful way.
3. A Certificate of Dishonor is included as Exhibit A.
4. A Final Letter of Default is included as Exhibit B.
5. As the performing party, CFRLT demands equity protection and specific performance.

WHEREFORE, Plaintiff requests:

1. This Court accept and recognize the attached Certificate of Dishonor and Letter of Default as judicial evidence;
2. Invoke equity jurisdiction under its powers to protect trusts and innocent parties;
3. Enter a constructive trust in favor of the Plaintiff over the subject property;
4. Grant such other relief as this Court deems just and proper.

Respectfully submitted,

[Date] *4/18/2025*

By: Sabar Lewis ucc 1-308 all rights reserved  
Sabar Lewis, Trustee, CFRLT

By: Pluyd Coleman  
Pluyd Coleman, Trustee, CFRLT

All rights reserved. Without prejudice. UCC 1-308.

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**[PROPOSED] ORDER GRANTING MOTION TO MOVE CASE TO EQUITY JURISDICTION  
AND FOR EQUITABLE RELIEF**

Having considered Plaintiff's Motion to Move Case to Equity Jurisdiction and for  
Equitable Relief, and good cause appearing,

IT IS HEREBY ORDERED that:

1. The above-captioned matter is hereby transferred to the equity jurisdiction of  
this Court.
2. The Court shall proceed to hear and determine the equitable claims and  
defenses of the parties, and to issue all appropriate equitable remedies.
3. Further proceedings in this matter shall be conducted under the principles and  
maxims of equity.

IT IS SO ORDERED.

DATED this \_\_\_\_ day of \_\_\_\_\_, 2025.

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DISTRICT COURT JUDGE

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**EXHIBIT A – CERTIFICATE OF DISHONOR**

**CERTIFICATE OF DISHONOR**

Date: 4/18/2025

This Certificate of Dishonor is issued by the Trustees of the Coleman Family Revocable Living Trust (CFRLT), pursuant to principles of honor, equity, and due process.

WHEREAS, on v November 27, 2024, a private presentment was sent to PNC Bank via Certified Mail #9589 0710 5270 2008 7955 34, containing demands for accounting, validation, and proof of claim, and offering remedy and performance by private negotiable instrument.

WHEREAS, PNC Bank failed to timely rebut or respond to said presentment within 10 days as stipulated.

NOW, THEREFORE, CFRLT issues this Certificate of Dishonor for the record. Silence is dishonor. Truth is established by un rebutted affidavit and failure to cure.

Executed by:

\_\_\_\_\_  
Sahar Lewis, Trustee

*By Sahar Aminda Lewis, all rights reserved UCC 1-308*

\_\_\_\_\_  
Pluyd Coleman, Trustee

*By Pluyd Coleman UCC 1-308 w/o prejudice*



**AFFIDAVIT OF FINAL DEFAULT JUDGMENT AND CEASE AND DESIST ORDER**

**Re: Coleman Family Revocable Living Trust v. PNC Bank, N.A.**

**Affiant:** Sahar Lewis, Trustee

**Trust:** Coleman Family Revocable Living Trust

**Respondent:** PNC Bank, N.A.

**Date of Final Judgment Sent:** November 27, 2024

**Tracking No.:** 9589 0710 5270 2008 7955 34

**Cure Period:** Ten (10) calendar days

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**COMES NOW**, Sahar Lewis, Trustee for the **Coleman Family Revocable Living Trust** ("Affiant"), who does solemnly swear, affirm, and declare under penalty of perjury:

1. That on November 27, 2024, Affiant, acting in full authority as Trustee, issued and served upon **PNC Bank, N.A.**, addressed to its Chief Executive and Chief Financial Officers at **300 5th Avenue, Pittsburgh, PA 15222**, a formal instrument titled **Final Default Judgment and Cease and Desist**.
2. The notice was delivered via Certified U.S. Mail under tracking number **9589 0710 5270 2008 7955 34**, and provided a lawful **ten (10) day opportunity to cure** or rebut the terms stated therein, including demands related to verified accounting, performance, contractual standing, and dishonor of negotiable instruments.
3. Said instrument established the administrative facts that Respondent had **dishonored prior presentments**, failed to provide verification of any lawful security interest or debt obligation, and was continuing to act in fraud and breach of trust.
4. The notice expressly stated that absent cure or verified rebuttal within the allotted timeframe, Respondent would be held in **final default**, and a **binding administrative judgment** would be entered against them.
5. As of the date of this affidavit, PNC Bank, N.A. has **failed to cure, respond, or otherwise rebut** said notice in any lawful or timely manner, and is therefore deemed in **full and final default**.
6. Respondent's silence constitutes **tacit acquiescence, agreement by estoppel, and dishonor by nonperformance**, thus giving rise to a **lawful administrative default judgment** and invocation of the **Cease and Desist** provisions as stated.
7. PNC Bank, N.A., its agents, trustees, successors, and assigns are **hereby estopped and ordered to cease and desist** from any further collection, enforcement, foreclosure, or adverse actions against the Coleman Family Revocable Living Trust, its Trustees, or its secured property.

8. Affiant reserves all rights, including commercial lien, equity enforcement, injunctive relief, quiet title, and judicial remedies arising from this unrebutted default.

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Executed this 18<sup>th</sup> day of April, 2025.

By:

Sahar-Aminda Lewis, all rights reserved UCC 1-308

**Sahar Lewis**, Trustee

Coleman Family Revocable Living Trust

3139 Belvedere Dr Henderson Nevada [89014]

**SETTLEMENT DEMAND NOTICE**

*In the matter of: Sahar Lewis, Trustee, Coleman Family Revocable Living Trust v. PNC Bank, et al.*

**Clark County District Court  
Case No.: A-25-916476-C**

To Whom It May Concern:

Pursuant to the Plaintiff's Verified Complaint and pending Motion to Move Case to Equity Jurisdiction, the Plaintiff hereby provides formal notice that she is willing to engage in a **private settlement negotiation** and **mutually agreeable resolution** of all claims and disputes, conditioned upon:

1. **Immediate cessation of all foreclosure proceedings** and withdrawal of the Notice of Trustee Sale.
2. **Reinstatement of legal title and quiet enjoyment** of the subject property by the Coleman Family Revocable Living Trust.
3. **Compensation for damages** sustained by Plaintiff in the amount of **\$180,000,000**, as outlined in the Verified Complaint, or such other sum as may be agreed in equity.
4. **Correction of public records** including retraction of any derogatory or false credit reporting or slander of title.

This notice is not an admission or waiver but a good faith effort to resolve this matter without further litigation. Plaintiff reserves all rights and remedies, including equitable and injunctive relief, and will proceed accordingly should no response be received within **10 business days** of this notice.

Respectfully,

**Sahar Lewis**, Trustee

Coleman Family Revocable Living Trust

Date: 4/18/2025

*By: Sahar-Amanda: Jazf, UCC-308, all rights reserved*

**SAHAR LEWIS, PLUYD COLEMAN Trustee, Coleman Family Revocable Living Trust,**  
**Plaintiff,**

**v.**

**PNC Bank, N.A.; Clear Recon Corp.; Matrix Trust; Stefanie Armijo, et al.,**  
**Defendants.**

**DISTRICT COURT OF CLARK COUNTY, NEVADA**

**Case No.: A-25-916476-C**

**Dept. No.: 7**

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**PROOF OF SERVICE BY MAIL**

I, the undersigned, declare as follows:

I am over the age of 18 and not a party to this action. On the date indicated below, I served the following documents:

- District Court Civil cover sheet
- Verified complaint
- TRO Motion
- Lis Pendes
- This Proof of Service

By placing a true and correct copy of each document in a sealed envelope and mailing them via **United States Postal Service Certified Mail** with postage fully prepaid, addressed as follows:

**PNC Bank, N.A.**

ATTN: Legal Department

249 Fifth Avenue

Pittsburgh, PA 15222

Certified Mail No.: 9589 0710 5270 1720 9672 12

**Clear Recon Corp.**

4375 Jutland Dr., Suite 200

San Diego, CA 92117

Certified Mail No.: 9589 0710 5270 1720 9672 36

**Matrix Trust Company**

717 17th Street, Suite 1300

Denver, CO 80202

Certified Mail No.: 9589 0710 5270 1720 9672 43

**Stefanie Armijo, Trustee**

c/o Clear Recon Corp.  
4375 Jutland Dr., Suite 200  
San Diego, CA 92117  
Certified Mail No.: 9589 0710 5270 1720 9672 29

**Clerk of the Court**

District Court, Clark County  
200 Lewis Ave  
Las Vegas, NV 89155  
(For filing only — not a party)

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

Executed this 10 day of April, 2025  
at Las Vegas, Nevada.

**Signature:** Sandra Baron

**Name:**

SANDRA BARON